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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**
12

13 In re

14 PG&E CORPORATION

15 and
16

17 PACIFIC GAS AND ELECTRIC
18 COMPANY,

Debtors.

Case Nos. 19-30088 DM (Lead Case)
19-30089 DM

Chapter 11
Jointly Administered

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors

22 * All papers shall be filed in the Lead Case
23 No. 19-30088 DM.

Date: October 7, 2019
Time: 9:30 a.m.
Place: Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, California

DKT # 3940

24
25 **SUPPLEMENT TO JOINDER BY TURN IN JOINT MOTION OF THE**
26 **OFFICIAL COMMITTEE OF TORT CLAIMANTS AND AD HOC COMMITTEE OF**
27 **SENIOR UNSECURED NOTEHOLDERS TO TERMINATE THE**
28 **DEBTORS' EXCLUSIVE PERIODS PURSUANT TO SECTION 1121(d)(1)**
OF THE BANKRUPTCY CODE

1 The Utility Reform Network (“TURN”) previously joined in the Joint Motion of the Official
2 Committee of Tort Claimants and Ad Hoc Committee of Senior Unsecured Noteholders to
3 Terminate Debtors’ Exclusive Periods Pursuant to Section 1121(d)(1) of the Bankruptcy Code [Dkt.
4 #3940] (the “Joint Motion”). The CPUC has now formally approved the OII that TURN referenced
5 in its previous Joinder pleading.¹

6 TURN is filing this Supplement to focus the parties and Court on paragraph 2(c) of the OII:
7 the obligation of CPUC to find pursuant to AB 1054 that the “... plan is neutral, on average, to
8 PG&E’s ratepayers; and ... recognizes the contributions of PG&E’s ratepayers, if any, to resolving
9 the insolvency proceeding and compensates them accordingly through mechanisms approved by the
10 Commission.”

11 The Debtors’ plan will not be approved by CPUC if it cannot meet the requirements of AB
12 1054 and may therefore be incapable of confirmation by this Court because it will not have met the
13 requirement to comply with Bankruptcy Code section 1129(a)(6).

14 TURN believes that the best way to ensure that the Debtors meet the requirements of AB
15 1054 would be to terminate exclusivity and allow competing plans to move forward. Competition
16 among plans will provide different alternatives for achieving the required compliance with AB 1054,
17 which will better inform the CPUC’s required determinations under that statute and increase the
18 likelihood of adoption of the best plan under the circumstances.

19 Dated: October 1, 2019

BINDER & MALTER, LLP

21 By: /s/ Robert G. Harris

22 Robert G. Harris

23 Attorneys for TURN, the Utility Reform Network

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25 ¹ Order Instituting Investigation on the Commission's Own Motion to Consider the Ratemaking and
26 Other Implications of a Proposed Plan for Resolution of Voluntary Case filed by Pacific Gas and
27 Electric Company Pursuant to Chapter 11 of the Bankruptcy Code, in the United States Bankruptcy
28 Court, Northern District of California, San Francisco Division, In re Pacific Gas and Electric
Corporation and Pacific Gas and Electric Company, Case No. 19-30088 (the “OII”).